

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re: MP BUILD GROUP LLC	§	Case No. 24-41841 (Chapter 7)
	§	
FORD MOTOR CREDIT COMPANY LLC,	§	
its successors and/or assigns, Movant	§	
	§	
vs.	§	
	§	
MP BUILD GROUP LLC, Debtor and	§	JUDGE BRENDA T. RHOADES
Christopher Moser, Trustee, Respondents	§	
	§	
	§	
	§	
	§	
	§	

**AFFIDAVIT IN SUPPORT OF
MOTION FOR RELIEF FROM AUTOMATIC STAY**

Pamela Rucker, being duly sworn, deposes and states:

1. I am a _____ Account Services Representative of Ford Motor Credit Company LLC and am authorized to sign this affidavit on behalf of Ford Motor Credit Company LLC, as movant ("Movant") with respect to a certain loan (the "Loan") provided to Debtor(s), which Loan is evidenced by the Contract (defined below).

2. As part of my job responsibilities for Ford Motor Credit Company LLC, I am familiar with the types of records maintained by Ford Motor Credit Company LLC in connection with the Loan and the procedures for creating those types of records. I have access to the books, records and files of Ford Motor Credit Company LLC that pertain to the Loan and extensions of credit given to Debtor(s) concerning the Collateral (defined below).

3. The information in this affidavit is taken from Ford Motor Credit Company LLC's business records regarding the Loan. I have personal knowledge of Ford Motor Credit Company

LLC's procedures for creating these types of records. The records are: (a) made at or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information in the business record, or from information transmitted by persons with personal knowledge; (b) kept in the course of Ford Motor Credit Company LLC's regularly conducted business activities; and (c) it is the regular practice of Ford Motor Credit Company LLC to make such records.

4. The Debtor(s) has/have executed and delivered or is/are otherwise obligated with respect to that certain vehicle retail installment contract in the original principal amount of \$70,369.56 (the "Contract"). A true and correct copy of the Contract is attached hereto as Exhibit "A".

5. Pursuant to that Contract, Movant is a secured creditor with a lien on a 2019 FORD SUPER DUTY F-350 SRW - VIN 1FT8W3BT8KEE61642. A true and correct copy of the Title is attached hereto as Exhibit "B".

6. In addition to the other amounts due to Movant, as of the date hereof Movant has also incurred legal fees and costs. All rights of Movant are reserved to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

7. The property may be uninsured. Additionally, the following chart sets forth the number and amount of post-petition payments due pursuant to the terms of the Contract that have been missed by the Debtor(s):

Description	From - To	# of Payments @ Monthly Amt	Total Amt
Payments	08/19/2024 - 04/19/2025	9 @ \$1,189.29	\$10,703.61

Total: \$10,703.61

8. Attached hereto as Exhibit "D" is a post-petition payment history with respect to the Obligations.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22 day of May, 2025.

Pamela Rucker

Name: Pamela Rucker

Title: Account Services Representative

State of Colorado

County of El Paso

Subscribed and sworn to (or affirmed) before me on this 22 day of May, 2025 by Pamela Rucker, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

[Signature]
Signature

(Notary Seal)

